

Zhuo Wang

Zhang v. Tiptop Energy Production

10/26/2017

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

JIDONG ZHANG,)
)
Plaintiff,)
) Case Number
vs.) CIV-16-1044-D
)
TIPTOP ENERGY PRODUCTION,)
)
Defendant.)

DEPOSITION OF ZHUO WANG
TAKEN ON BEHALF OF THE PLAINTIFF
ON OCTOBER 26, 2017
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: BRENDA SCHMITZ, CSR, RPR
CITY REPORTERS, INC.
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1 APPEARANCES:

2
3 FOR THE PLAINTIFF:

4 MR. J. KELLY WORK
5 Attorney at Law
6 105 N. Hudson
7 Suite 304
8 Oklahoma City, Oklahoma 73102

9 FOR THE DEFENDANT:

10 MS. MEGHAN NYLIN
11 Thompson & Knight
12 One Arts Plaza
13 1722 Routh Street
14 Suite 1500
15 Dallas, Texas 75201

16 Also present: Li Feng
17 Jidong Zhang

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1 STIPULATIONS

2 It is hereby stipulated and agreed by and
3 between the parties hereto, through their respective
4 attorneys, that the deposition of ZHUO WANG may be
5 taken on behalf of the Plaintiff on OCTOBER 26, 2017
6 in the City of Oklahoma City, Oklahoma by Brenda
7 Schmitz, Certified Shorthand Reporter within and for
8 the State of Oklahoma, taken by agreement pursuant
9 to the Federal Rules of Civil Procedure.

10 It is further stipulated and agreed by and
11 between the parties hereto, through their respective
12 attorneys, that all objections, except as to the
13 form of the question and the responsiveness of the
14 answer, are reserved until the time of trial, at
15 which time they may be made with the same force and
16 effect as if made at the time of the taking of this
17 deposition.

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1 And thereupon the following witness was produced
2 by the Plaintiff:

3 ZHUO WANG,
4 the witness hereinbefore named, being first duly
5 cautioned and sworn to testify the truth, the whole
6 truth, and nothing but the truth, testified on her
7 oath as follows:

8 DIRECT EXAMINATION

9 BY MR. WORK:

10 Q. Could you please state your name?

11 A. My first name is Z-H-U-O, last name
12 W-A-N-G. But I go by Zoe.

13 Q. All right. And where do you live?

14 A. I live in Edmond.

15 Q. What's your residence address?

16 A. 316 Northwest 154th Street, Edmond,
17 Oklahoma, 73013.

18 Q. And where are you employed?

19 A. Tiptop Oil and Gas US, LLC.

20 Q. And how long have you been employed there?

21 A. From December 20, 2014.

22 Q. What is your educational background?

23 A. Master of accounting.

24 Q. Accounting?

25 A. Yeah.

1 Q. That's not something you ever heard?

2 A. No.

3 Q. Were you aware of the fact that Susan was
4 pregnant was becoming an issue with anyone at
5 Tiptop? Did you become aware of that?

6 A. Can I explain?

7 Q. Do you need me to explain?

8 A. No. Can I?

9 Q. You can certainly explain, yes.

10 A. I think everybody is okay after they know
11 she's pregnant. But I don't know what really
12 happened, and since I know Susan sued -- sued Xiang
13 Jiang and Mr. Wang and Tina, and so we just -- just
14 talk to her very carefully after we knew that, we
15 know that.

16 Q. Did somebody -- did someone at Tiptop
17 suggest that to you?

18 A. No.

19 Q. That's just something you concluded on
20 your own?

21 A. Yes.

22 Q. And did someone tell you that Susan had
23 sued President Wang and Xiang Jiang and Li Feng?

24 A. Yes.

25 Q. Who told you that?

1 A. Xiang Jiang.

2 Q. And I want to be clear about who that is
3 because I'm not sure.

4 A. Uh-huh.

5 Q. Who is that?

6 A. The financial -- financial manager.

7 Q. Okay. Yeah. I'm not sure -- I have a
8 different pronunciation that I'm sure is wrong, so I
9 just wanted to make sure I knew who you were talking
10 about. So, what did he tell you about that?

11 A. He just told me Susan sue him and Mr. Wang
12 and Tina, and I asked why. And he said, "I don't
13 know." That's it.

14 Q. He didn't give you any other information
15 about that?

16 A. No.

17 Q. When was that conversation?

18 A. Sorry, I can't remember.

19 Q. Was it during 2015?

20 A. Yes.

21 Q. And was it before or after Susan was no
22 longer working at Tiptop?

23 A. Before.

24 Q. She was still there?

25 A. Yes.

1 Q. And did he tell you that you needed to be
2 careful, or did he give you any advice about what
3 you should do?

4 A. No.

5 Q. He just gave you this information?

6 A. Yes.

7 Q. Did he tell you why he was giving you this
8 information?

9 A. No.

10 Q. Did he ask you to do anything?

11 A. No. Just be careful.

12 Q. That's what he said?

13 A. Yeah.

14 Q. Do you know if he told that to anyone
15 else?

16 A. I don't know.

17 Q. Was anyone else present when you had that
18 conversation with the financial manager?

19 A. No.

20 Q. Were you aware at the time in 2015 that
21 the fact that Susan was pregnant was raising this
22 issue in the company of her being in violation of
23 China's one child policy, and/or that she should be
24 transferred back to China so that the child would be
25 born in China? Did you become aware of any of that?

1 A. I heard about it.

2 Q. What did you hear about that?

3 A. Just like you said, for the one child
4 policy, she cannot have another child.

5 Q. And did you hear something about that
6 while you were working at Tiptop?

7 A. Let me think about that.

8 Q. Okay.

9 A. I'm not sure about this answer because the
10 way -- I am -- I was friends with Susan before, and
11 I think Susan told me about that, too, but I cannot
12 remember clearly.

13 Q. Okay. You're not clear about what you
14 heard from Susan and what you heard from other
15 people at Tiptop?

16 A. Right.

17 Q. Okay. Do you remember being told anything
18 about that issue, about the violation of the one
19 child policy or about a requirement that the Chinese
20 expatriate, who was pregnant, needed to go back to
21 China so the child would be born in China, did you
22 hear anything about that from the financial manager?

23 A. No.

24 Q. Xiang Jiang?

25 A. No.

1 Q. Or from President Wang?

2 A. No.

3 Q. Or from Li Feng?

4 A. No.

5 Q. Do you know if there was any penalty that
6 was imposed on Tiptop Energy as a result of Susan
7 being pregnant with a second child?

8 A. I don't know.

9 Q. Did you ever hear anything about that,
10 about any --

11 A. No.

12 Q. Did you, personally, suffer any kind of
13 penalty or disciplinary action as an employee of
14 Tiptop as a result of Susan's pregnancy?

15 A. No.

16 Q. Do you know if anyone else did at Tiptop?

17 A. I don't know.

18 Q. Did you ever hear that anything about
19 Susan being told after it became known at Tiptop
20 that she was pregnant, that she should resign from
21 her job?

22 A. Yes.

23 Q. What do you remember about that?

24 A. Probably during our -- I was communicate
25 with Susan, she told me about that.

1 Q. Did anyone else at Tiptop tell you about
2 that?

3 A. No.

4 Q. What did Susan tell you about it?

5 A. I -- about -- I can't remember clearly,
6 but Susan told me she might go -- she might go back
7 to China or -- let me think about that. Susan told
8 me the company told her she need to go back to China
9 to work instead of stay here, because she was
10 pregnant.

11 Q. Did she tell you anything else about that?

12 A. Repeat again.

13 Q. Did Susan tell you anything else about
14 that?

15 A. I can't remember.

16 Q. Did you ever learn about that -- about any
17 other information about that from anyone else at
18 Tiptop?

19 A. No.

20 Q. What about from anyone at SIPC?

21 A. No.

22 Q. Did you ever have any communication with
23 anyone at SIPC about Susan's pregnancy?

24 A. No.

25 Q. After Tiptop Energy became aware of

1 Q. Why did that not apply to you?

2 A. I'm local.

3 Q. You're considered a local employee?

4 A. Uh-huh. Yes, I'm not a full employee in
5 Tiptop at that time, I'm just an intern.

6 Q. At the time you were pregnant?

7 A. Yes.

8 Q. You were still an intern?

9 A. Yes.

10 Q. All right. Well, do you have any
11 knowledge of work being withheld from Susan or taken
12 away from Susan during the time she was pregnant?

13 A. I -- I noticed she had less job than
14 before.

15 Q. What did you notice about that?

16 A. I can't forgot, sorry.

17 Q. You said that you noticed that she had
18 less job than before. Is that what you said? Can
19 you just explain what you mean by that?

20 A. Let me recall my memory. Because before
21 Susan always worked late, and she work sometimes
22 during the weekend, but after they knew she was
23 pregnant, she just -- she just go back home right
24 after the work. So that is why I thought her job is
25 worse now, much as before.

1 Q. She wasn't working as many hours as
2 before?

3 A. She always worked late.

4 Q. Okay. All right. Anything else that you
5 know about that, about the issue of whether or not
6 there was any work that was being withheld from her
7 by Tiptop or taken away from her by Tiptop during or
8 after her pregnancy?

9 A. No one told me about that, just I felt she
10 has less job, she had less jobs than before.

11 Q. Just from what you observed?

12 A. Yes.

13 Q. Okay. No one told you anything about
14 that?

15 A. Yes.

16 Q. Okay. Were you ever asked to report on
17 Susan's activities to anyone at Tiptop management?

18 A. No.

19 Q. Were you ever asked to notice or to watch
20 when Susan was at work or not at work?

21 A. No.

22 Q. Did you ever report to President Wang when
23 Susan was at work or not at work?

24 A. Nope.

25 Q. How about to the financial manager, to

1 Xiang Jiang, did you ever report to him when Susan
2 was at work or not at work?

3 A. I think just once he ask me if she come --
4 she comes to work or not.

5 Q. When was that?

6 A. I think it's summertime, but I cannot
7 forgot.

8 Q. Do you remember, was it before or after --

9 A. Before she --

10 Q. -- Susan had left for maternity leave?

11 A. Before.

12 Q. It was before?

13 A. Uh-huh.

14 Q. While she was still there?

15 A. Yes.

16 Q. Okay. And what did you understand he was
17 asking of you?

18 A. I really don't know. I didn't ask the
19 reason.

20 Q. Okay.

21 A. I just tell him.

22 Q. Did he ask you to do anything?

23 A. No.

24 Q. Did you ever report back to him at a later
25 time about whether or not Susan was at work or not

1 at work?

2 A. No.

3 Q. Did you ever hear that President Wang had
4 that stated at a meeting with Chinese employees of
5 Tiptop words to the effect that Susan had no class?

6 A. No.

7 Q. Did you ever -- you never heard that?

8 A. I never heard that.

9 Q. Did you ever hear about any communication
10 from any management official at Tiptop Energy saying
11 that if persons were observed speaking to Susan,
12 that they would be taken for questioning?

13 A. No. I didn't hear about that.

14 Q. After -- do you recall when Susan returned
15 to the -- to work at Tiptop after her maternity
16 leave?

17 A. Uh-huh.

18 Q. You need to indicate either yes or no.

19 A. Yes.

20 Q. Okay. And do you remember when that was?

21 A. I can't remember. Sorry, I can't
22 remember.

23 Q. But do you remember her returning to work?

24 A. Yes.

25 Q. Okay. At that time, did you hear anything